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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC.; VALEANT
PHARMACEUTICALS INTERNATIONAL; and
AGMS, INC.,

Plaintiffs,

v.

AIG INSURANCE COMPANY OF CANADA;
ACE INA INSURANCE COMPANY; ALLIANZ
GLOBAL RISKS US INSURANCE COMPANY;
ARCH INSURANCE CANADA LTD; EVEREST
INSURANCE COMPANY OF CANADA;
HARTFORD FIRE INSURANCE COMPANY;
IRONSHORE CANADA LTD.; LIBERTY
INTERNATIONAL UNDERWRITERS, a division
of LIBERTY MUTUAL INSURANCE
COMPANY; and LIBERTY MUTUAL
INSURANCE COMPANY; LLOYD'S
UNDERWRITERS; LLOYD'S CONSORTIUM
9885 (a/k/a STARR FINANCIAL LINES
CONSORTIUM 9885); LLOYD'S SYNDICATE
ANV 1861; LLOYD'S SYNDICATE AMA 1200;
LLOYD'S SYNDICATE ARGO 1200; LLOYD'S

Civil Action No.: 3:18-cv-00493-
MAS-LHG

NOTICE OF PLAINTIFFS'
PARTIAL APPEAL

SYNDICATE AWH 2232; LLOYD'S :
 SYNDICATE BRT 2987; LLOYD'S SYNDICATE :
 CVS 1919; LLOYD'S SYNDICATE HCC 4141; :
 LLOYD'S SYNDICATE MITSUI 3210; LLOYD'S :
 SYNDICATE MIT 3210; LLOYD'S SYNDICATE :
 NAV 1221; LLOYD'S SYNDICATE QBE 1886; :
 LLOYD'S SYNDICATE SJC 2003; ROYAL & :
 SUN ALLIANCE INSURANCE COMPANY OF :
 CANADA; TEMPLE INSURANCE COMPANY; :
 and XL INSURANCE COMPANY SE., :

Defendants. :

PLEASE TAKE NOTICE that Plaintiffs Valeant Pharmaceuticals International, Inc. (“Valeant”), Valeant Pharmaceuticals International (“Valeant USA”), and AGMS, Inc. (collectively, “Plaintiffs”) will apply to the United States District Court at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, before the Honorable Lois H. Goodman, U.S.M.J., on January 21, 2020, at 10:00 AM, or soon thereafter as counsel may be heard for entry of an Order, reversing in part the December 5, 2019 Order (the “Order”) of Special Master Hon. Douglas K. Wolfson, and for such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs will rely upon the accompanying Memorandum of Law and Certification of Sherilyn Pastor, Esq., including the exhibits submitted with this Notice.

PLEASE TAKE FURTHER NOTICE that Plaintiffs hereby respectfully request oral argument pursuant to Local Civil Rule 78.1.

PLEASE TAKE FURTHER NOTICE that a Proposed Order is filed herewith.

Dated: December 20, 2019

McCARTER & ENGLISH, LLP

By: /s/ Sherilyn Pastor

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-and-

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AGMS, Inc.*